codes were assigned to Verizon wire centers. NYDPS found that there are at least four carriers providing wireless service in each county of New York State. Thus, for our impairment test, all wire centers reflect wireless availability.

II.   SUBSTITUTABILITY OF ALTERNATIVES

NYDPS proposes a suggested scale assigning substitutability weights to each intermodal offering considered in the intermodal impairment test. The weights assigned represent our best educated estimates and take into consideration variables such as level of service quality; necessity of entering long-term contracts; necessity of subscribing to broadband internet service; and E911 availability.

A.   Switching Impairment Methodology

NYDPS impairment test calculates a weighted index representing the availability of alternatives in the area served by each wire center. The impairment index measures the availability of competitive options to UNE-P based service by providing a total score based on the relative substitutability of available intermodal alternatives.

The intermodal alternatives were assigned the following weighted values:

- UNE-L providers of residential service = 1.
- UNE-L providers of "18 or lines or less" = .50.
- Internet access via cable modem or DSL (VoIP availability) = .75.
- PacketCable phone service = 1.
- More than 2 wireless offerings available = .50.

The total score is created by adding together each component value by wire center. For example, Verizon's wire center on State Street in Albany, New York, would have an impairment index value of 3.25 since customers served by that wire center have four competitive choices. UNE-L is only counted once. If service is available to residential customers, the wire center receives a "1", not a "1" and a ".50".

B.   Switching Impairment Conclusion

NYDPS viewed a total score of 2.75 or greater as sufficient to make a finding of "no impairment." The following table summarizes the impairment test results across Verizon's 520 New York wire centers:

Impairment Index	Wire Centers	UNE-P Lines	Total Lines
0.5	3	588	3,539
1.25	32	12,222	72,868
1.75	34	62,951	326,308
2.25	175	156,636	913,763
Total <2.75	244	232,397	1,316,478
2.75	117	388,350	1,863,948
3.25	159	1,208,018	7,699,131
Total >= 2.75	276	1,596,368	9,563,079
Total	520	1,828,765	10,879,557

Additionally, Appendix D contains maps depicting the results of our impairment test for New York. Those wire centers remaining impaired after the test has been applied (total score < 2.75) are in blue, while "unimpaired" wire centers (total score >= 2.75) are in red.

APPENDIX B
TRANSPORT LOGIT REGRESSION ANALYSIS

In response to the Commission's August 20, 2004 NPRM, NYDPS used data initially collected for its TRO proceeding to create a logit regression analysis attempting to calculate the potential for competition along routes not triggered by the TRO. We analyzed factors present on routes with existing transport competition (as measured by the TRO triggers) to determine if such factors correlate substantially with the development of competition along those routes.

I. TRANSPORT ANALYSIS VARIABLES

A. UNE-L Service to Customers with 18 Lines or Less

NYDPS used the same data source as that in its switching impairment test.[68] This data represents the number of CLECs serving small business and residence customers having 18 lines or less.

B. UNE-L Service to Residential Customers

NYDPS used the same data source as that in its impairment test excluding small business in the definition of mass market.[69]

C. Total Lines

This information was taken from Verizon's response to CLEC information requests in NYDPS' TRO proceeding and represents Verizon's total switched access lines as of June 2003. The number of total switched access lines equals the combined number of retail, resale and UNE-P lines.

D. UNE-L Rate

This information was taken from Appendix A of NYDPS Order Instituting Verizon's Incentive Plan.[70]

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[68] *See* Appendix A.

[69] *See* Appendix A.

[70] NYPSC Case 00-C-1945, *Proceeding on Motion of the Commission to Consider Cost Recovery by Verizon and to Investigate the Future Regulatory Framework; NYPSC Case 98-C-1357, Proceeding on Motion of the Commission to Examine New York Telephone Company's Rates for Unbundled Network Elements* (Issued and Effective February 27, 2002).

E.   Square Miles per Wire Center

This information was taken from wire center specific data contained in the HAI 5.2-NY Model (HAI Model) jointly sponsored by AT&T and WorldCom.[71]

F.   Proportion of Residential to Business Customers

This information was also gathered from the wire center specific data contained in the HAI 5.2-NY Model (HAI Model) jointly sponsored by AT&T and WorldCom.

G.   Annual Mean Household Income

This information was taken from United States 2000 census data regarding the average household earnings for residential customers on a Zip Code basis.

II.   TRANSPORT IMPAIRMENT METHODOLOGY

NYDPS transport logit regression analysis examines the foregoing characteristics as found on unimpaired routes determined under the Commission's TRO triggers. Those characteristics are analyzed on adjacent routes to determine with what probability competition is likely to develop. NYDPS accomplished this by adding information regarding wire center characteristics to trigger database information; identifying which characteristics are most correlated with the provision of alternative transport; determining if non-triggered "A to C"[72] routes have same important characteristics as triggered "A to B" routes, and investigating market failures on a case by case basis.

NYDPS found that there are approximately 27,000 possible interoffice, intraLATA transport routes between Verizon's New York State wire centers. Approximately 15,700 of those routes are associated with wire centers in which at least one CLEC uses its own switches to serve 18 line or less mass market customers.

Given the data submitted in that proceeding by competitive transport providers, NYDPS compiled a list of 135 routes having three or more transport competitors of any type.[73] Of those 135 routes, 72 routes were determined to have passed at least one of the five TRO transport triggers dedicated DS1, DS3, dark fiber transport. Consistent with

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[71] See NYPSC Order on Unbundled Network Element Rates, Exhibit 314-[RAM4] filed in NYPSC Case 98-C-1357, *Proceeding on Motion of the Commission to Examine New York Telephone Company's Rates for Unbundled Network Elements* (Issued and Effective January 28, 2002).

[72] "A to C" and "A to B" designations are taken from the D.C. Circuit's *USTA II* discussion regarding its discomfort with the Commission's TRO route by route analysis.

[73] Verizon identified 4,141 candidate routes for non-impairment status in its October 2003 filing in the NYPSC TRO proceeding.

our intermodal view of switching, however, we have focused on the 135 route count which includes transport between Verizon central offices for cable companies.[74]

NYDPS logit regression analysis was developed to address the D.C. Circuit's concern that the TRO triggers considered routes on an individual basis, ignoring facilities deployment on one route when examining an adjacent route. NYDPS examined the following factors as possibly being correlated with competitive entry: whether CLEC switches were used for residential service; whether CLEC switches were used to provide service to 18 line or less customers; the total number of customers served; UNE-L rates (that may be correlated with other factors such as margins); square mileage (density); the proportion of residential to business customers; and net household income (purchasing power).

NYDPS specified the likelihood of three or more transport competitors on an "A to B" route using the following logistic equation:

$$\ln\left[\frac{P_{transport\_comp}}{1 - P_{transport\_comp}}\right] = \beta_0 + \beta_1(switch\_res) + \beta_2(switch\_18\_lines) + \beta_3(tot\_lines)$$
$$+ \beta_4(une\_l\_rate) + \beta_5(sqmi) + \beta_6(res\_prop) + \beta_7(income)$$
$$+ \sum_{i=1}^{5} \delta_i(lata\_indicator_i) + \varepsilon_t$$

where the left side of the equation is the log of the odds of three or more transport competitors.

Specifically, the variables used in the right hand side of the regression equation are constructed using information collected for each end point wire center associated with each triggered route. To create a route's specific variable, we either total the information at the two end points, or average the information, as follows:

switch_18_line_=switch_18_line_a+switch_18_line_b
switch_res_=switch_res_a+switch_res_b
tot_lines_=tot_lines_a+tot_lines_b
une_l_rate_=(une_l_rate_a*(tot_lines_a/(tot_lines_a+tot_lines_b))+une_l_rate_b*(tot_lin
es_b/(tot_lines_a+tot_lines_b)))
sqmi_=sqmi_a+sqmi_b
resprop_=(resprop_a*(tot_lines_a/(tot_lines_a+tot_lines_b))+resprop_b*(tot_lines_b/(tot
_lines_a+tot_lines_b)))

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[74] The difference between Verizon's count and NYDPS results is that Verizon counted more collocations as being operationally ready to provide transport than those to which the CLECs attested as actually being operationally ready. Thus, using information provided by the CLECs, NYDPS made its determination that 72 routes were triggered by the TRO, and an additional 63 routes had three or more self-provisioning competitors, some of which were cable companies.

income_ =income_a*(tot_lines_a/(tot_lines_a+tot_lines_b))+
income_b*(tot_lines_b/(tot_lines_a+tot_lines_b)))

Also included in the model were LATA indicator variables.

The signs of the explanatory variables meet our expectations with the exception of the margin variable. Those estimates with odds ratios much different than 1 are the most telling in terms of their effect on competitive entry. For example, the estimated odds ratio of 3.03 for the 18 lines or less switch variable should be interpreted as: "the odds of having 3 or more transport competitors increase by more than a 3 to 1 ratio with the presence of additional CLEC switches serving 18 lines or less customers." The estimated coefficients and statistical significance are summarized in the following table:

Transport Logit Regression Model Estimates & Summary Statistics					
				Number of obs =	26450
Transformed Dependent Variable = transport_comp				LR chi2(10) =	5275.45
				Prob > chi2 =	0
Log likelihood = -695.6576				Pseudo R2 =	0.7913
Explanatory Variable	**Odds Ratio**	**Coefficient Estimate**	**Standard Error**	**z**	**P>z**
switch_res_	0.6917555	-0.3685227	0.0907561	-4.06	0
switch_18_lines_	3.03273	1.109463	0.0596284	18.61	0
tot_lines_	1.000015	0.000015	1.86E-06	8.04	0
une_l_rate_	1.282584	0.2488764	0.0951908	2.61	0.009
sqmi_	0.9516942	-0.0495115	0.0073432	-6.74	0
resprop_	0.001081	-6.829871	0.5731995	-11.92	0
income_	1.000005	4.73E-06	4.53E-06	1.04	0.297
lata_alb	50101.27	10.8218	0.6310914	17.15	0
lata_buff	1748470	14.37425	0.6231934	23.07	0
lata_syr	175743.7	12.07678	0.7873747	15.34	0
_constant		-20.76803	1.333524	-15.57	0
note: lata_bing_ =0 predicts failure perfectly, lata_bing dropped and 672 obs not used					
note: lata_pou_ =0 predicts failure perfectly, lata_pou dropped and 861 obs not used					

III.   TRANSPORT LOGIT ANALYSIS RESULTS

For those 135 routes which actually have 3 or more transport competitors, the model's estimated probability of competition is 67% on average. The "goodness of fit" (R2) coefficient indicates a 79% explanatory power.

The regression analysis identifies 46 potentially unimpaired "A to C" routes from the latest regression including: 8 routes with zero competitors; 12 routes with one competitor; and 26 routes with two competitors. In other words, the regression analysis

demonstrates 46 "A to C" routes having more than a 50% likelihood of competition. Omitted from the results are the following routes with less than an estimated probability of 50%: 163 routes with two competitors; 608 routes with one competitor; and about 26,000 routes with zero competitors.

Appendix D contains a map showing the routes in Verizon's New York territory with three or more competitors.

IV.   TRANSPORT IMPAIRMENT CONCLUSION

The available factors that are present on routes with three or more competitors do not substantially correlate with the competition on those routes. Additionally, because those factors do not substantially correlate with the emergence of competition on triggered routes, such factors are not an accurate predictor of competition on non-triggered routes.

APPENDIX C
NYDPS DATA COLLECTION
MARCH 31, 2004 NYDPS MEMORANDUM

The following pages contain a NYDPS memorandum that was circulated to the parties to NYDPS TRO proceeding explaining our data collection efforts and detailing the results.

STATE OF NEW YORK DEPARTMENT OF PUBLIC SERVICE
THREE EMPIRE STATE PLAZA, ALBANY, NY 12223-1350
Internet Address: http://www.dps.state.ny.us

March 31, 2004

DEPARTMENT OF PUBLIC SERVICE STAFF'S
ANALYSIS OF SWITCHING AND TRANSPORT TRIGGERS

Background

As part of the New York State Public Service Commission's (Commission) Case 03-C-0821, implementing the Federal Communication Commission's (FCC) August 21, 2003 Triennial Review Order (TRO), Staff compiled, in consultation with numerous parties and non-parties to the proceeding, questions designed to obtain relevant information to implement the unbundling requirements specified in 47 CFR § 51.319. Staff collected information specifically related to satisfying the FCC's transport, switch, and high-capacity loop trigger analysis[1] via an information request sent on October 3, 2003. Thereafter, on October 17, 2003, Staff sent a clarification that addressed questions raised by the parties regarding issues presented in the information request.

On November 17, 2003, Staff distributed a preliminary summary of the results of its data collection efforts. These results were discussed at a technical conference held on December 2, 2003. During the conference, it was decided that all CLECs who were parties to the proceeding would be invited to participate in a group effort to produce a joint set of additional information requests. CLEC-to-CLEC switching-related requests were issued on December 15, 2003 and CLEC-to-ILEC requests were distributed on December 22, 2003. Follow-up transport information requests were issued on December 16, 2003. Responses to all follow-up requests were due on January 9, 2004.

In light of the D.C. Circuit's *USTA II* decision, which vacated and remanded portions of the TRO, including the FCC's national impairment findings for dedicated transport and switching, these data gathering efforts will need to be re-evaluated. But in view of Chairman Flynn's commitment to moving forward and the upcoming technical conference to discuss

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[1] Information regarding high-capacity loops was only collected in Frontier of Rochester's territory because Verizon New York, Inc. elected to not challenge those TRO findings at this time.

information gathering efforts in light of the D.C. Circuit decision, the following is presented to inform the parties of the above-referenced data collection effort. The results presented below obviously do not represent an ultimate finding in Case 03-C-0821.

Summary

A.   SWITCHING

1. Criteria

The FCC enumerated certain criteria to be followed when applying the switching-related triggers. Staff applied the local switching self-provisioning trigger as specified in 47 CFR §51.319 (d) (iii) (A) (1).[2]

2. Issues

The following may affect the outcome of the switching trigger analysis:

- Definition of Mass Market – The mass market has not yet been defined.[3]

- Qualifying Provider – Staff's analysis excluded wireless and data switches.[4] Staff did include cable as an eligible switch provider.[5]

- Defining the Geographic Market – The relevant geographic market must be defined, and consideration must be given to a competitor's ability to serve specific markets economically and efficiently using currently available technologies.[6] Staff's analysis is conducted on a wire center by wire center basis.

- Actively Providing – The self-provisioning trigger goes to identifying competitive carriers with switches that are actively providing voice service.[7] Accordingly, there may be switches serving very few UNE-L lines, and those switches could be deemed as not "actively providing" and, therefore, not eligible for the switching trigger.[8]

3. Application of Switching Triggers

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[2]   On page 5 of its November 10, 2003 letter to Judge Linsider in this proceeding, Verizon indicated that it would not challenge the local switching competitive wholesale facilities trigger specified in 47 CFR §51.319 (d) (iii) (A) (2).

[3]   TRO at ¶459.

[4]   Id. at ¶445.

[5]   Id. at ¶501, footnote 1560.

[6]   Id. at ¶495.

[7]   Id. at ¶499.

[8]   Staff is providing its compilation of lines served by CLEC switches on a separate disk along with its revised underlying switching and transport data base. Note, some parties did not provide information on the number of lines served by their switches.

- Staff's list of relevant wire centers are in Attachment 1 (including small business in the definition of mass market)[9] and Attachment 2 (excluding small business in the definition of mass market).[10]

- If mass market is interpreted to include carriers serving residential or business customers with 18 lines or less, then 162 Verizon and 7 Frontier wire centers could potentially pass the trigger. If mass market is interpreted to include only carriers offering service to residential customers, then 19 Verizon and no Frontier wire centers could potentially pass the trigger.

B. TRANSPORT

1. Criteria

The FCC enumerates certain transport trigger tests in 47 CFR §§51.319 (e) (1), (2) & (3). Staff applied the following triggers:

Competitive wholesale facilities trigger for dedicated DS1 transport
47 CFR § 51.319 (e) (1) (ii) - (2 or more competing providers)

Self-provisioning trigger for dedicated DS3 transport
47 CFR § 51.319 (e) (2) (i) (A) - (3 or more competing providers)

Competitive wholesale facilities trigger for dedicated DS3 transport
47 CFR § 51.319 (e) (2) (i) (B) - (2 or more competing providers)

Self-provisioning trigger for dark fiber transport
47 CFR § 51.319 (e) (3) (i) (A) - (3 or more competing providers)

Competitive wholesale facilities trigger for dark fiber transport
47 CFR § 51.319 (e) (3) (i) (B) - (2 or more competing providers)

2. Issues

The following may affect transport outcomes:

- Staff assumed that the two end points of a candidate route are connected all the way through unless the CLECs provided additional information indicating that the fiber exiting a collocation arrangement goes 1) directly to a CLEC switch or 2) transits another carrier's facilities somewhere along the candidate A to Z route.

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[9]   Id. at ¶127

[10]   Id. at footnote 432.

- Staff did not assume that a route that met a DS3 trigger implied that it also automatically met a DS1 trigger.

- Staff dropped routes associated with collocations based on subsequently provided CLEC information indicating that those collocations were not operationally ready to provide transport.

Questions regarding the assumption that two end points of a candidate route are connected all the way through, coupled with a possible disparity in the count between those collocations assumed by Verizon to be operationally ready versus collocations attested to as being operationally ready by the CLECs providing data to Staff, resulted in a Staff determination that more information was needed. On December 23, 2003, a Staff letter requested clarification from the parties regarding the operational status of collocation nodes at issue on each CLEC's network.

3. Application of Transport Triggers

- *Additional information regarding operational readiness decreased the 270 routes identified by Staff on November 17, 2003 to 219 routes (Attachment 3).*

- These 219 routes decreased to 126 routes based on incomplete information provided regarding the type of facility provisioned or an entry of "NA" for type of facility provisioned.

- Exclusion of interLATA routes[11] reduced the number of routes to 100.

- These 100 routes are comprised of

  > 36 wholesale DS-1 routes (Attachment 4);
  > 48 self-provisioned DS-3 routes (Attachment 5);
  > 37 wholesale DS-3 routes (Attachment 6);
  > 46 self-provisioned dark fiber routes (Attachment 7); and
  > 0 competitive dark fiber routes (Attachment 8).

- Of the remaining 100 routes, 72 are in Verizon's New York service territory and 28 are in the Frontier of Rochester service territory (Attachment 9).

- The results of the above queries are subject to change as more information is provided.

Distribution of Data

As was done following the December 2, 2003 technical conference in this proceeding, Staff is providing the data underlying this analysis in an easy to manipulate format. Only active parties' data is being released. As discussed above, Staff is also providing its compilation of lines served by CLEC switches.

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[11]   Id. at ¶365.

A disk containing these proprietary data will be sent to a representative on the active party list who executed the protective order in Case 03-C-0821. This information should only be shared on an as needed basis with others who have signed the protective order.

Attachments to March 31, 2004

NY PSC Case 03-C-0821

Department of Public Service Staff's

Analysis of Switching & Transport Triggers

Staff List of Wire Centers With 3 or More CLEC Switches
Serving Residential and Small Business Customers
per TRO Paragraph 127

WIRE_CNTR	Wire Center Name	Count	WIRE_CNTR	Wire Center Name	Count	WIRE_CNTR	Wire Center Name	Count
NYCMNY30	E. 30Th St. NY	10	BFLONYEL	Buffalo-Elmwood Ave. NY	5	NYCMNYWA	W. 176Th St. NY	4
NYCMNY56	E. 56Th St. NY	10	BFLONYHE	Buffalo-Hertel Ave. NY	5	WSNCNYUN	W. Seneca-Union Rd. NY	4
NYCMNY13	Second Ave. NY	10	NYCMNYCA	Convent Ave. NY	5	AMSTNYPE	Amsterdam NY	3
NYCMNY18	W. 18Th St. NY	10	DRPKNYDP	Deer Park NY	5	ARVGNYAV	Armonk NY	3
NYCMNY36	W. 36Th St. NY	10	ENPTNYEN	E. Northport NY	5	AUBNNYAU	Auburn NY	3
NYCMNY50	W. 50Th St. NY	10	NYCKNYFA	Fairview Ave. NY	5	NYCKNYAI	Ave. I NY	3
WHPLNYWP	White Plains NY	10	GLFLNYGF	Glens Falls NY	5	BAVLNYBV	Baldwinsville NY	3
NYCMNYBS	104 Broad St. NY	9	NYCQNYHS	Hollis NY	5	BRWSNYBW	Brewster NY	3
NYCMNYWS	140 West St. NY	9	MSPQNYMP	Massapequa NY	5	NYCKNYBU	Bushwick Ave. NY	3
NYCMNY37	E. 37Th St. NY	9	MTVRNYMV	Mount Vernon NY	5	CICRNYCJ	Cicero NY	3
NYCMNY79	E. 79Th St. NY	9	PSVLNYPV	Pleasantville NY	5	CLAYNYOS	Clay/Liverpool NY	3
HMPSNYHS	Hempstead NY	9	NYCQNYRH	Richmond Hill NY	5	CLPKNYCP	Clifton Park NY	3
HCVLNYHV	Hicksville NY	9	RSLNNYRO	Roslyn NY	5	CMMKNYCM	Commack NY	3
HNSTNYHU	Huntington NY	9	SYRCNYSU	Syracuse-State St. NY	5	DLMRNYDA	Delmar NY	3
NYCMNY42	W. 42Nd St. NY	9	WNTGNYWT	Wantagh NY	5	NYCQNYFR	Far Rockaway NY	3
NYCMNY73	W. 73Rd St. NY	9	NYCKNYWM	Williamsburg NY	5	FYVLNYFV	Fayetteville NY	3
NYCMNY97	E. 97Th St. NY	8	WSVLNYNC	Williamsville NY	5	GLCVNYGC	Glen Cove NY	3
LYBRNYLB	Lynbrook NY	8	YNKRNYYN	Yonkers NY	5	GDISNYGI	Grand Island NY	3
MINLNYMI	Mineola NY	8	NYCQNYOP	115Th Ave. NY	4	HMBGNYHB	Hamburg NY	3
NYCMNYVS	Vanck St. NY	8	NYCKNYFT	14Th Ave. NY	4	NYCXNYHO	Hoe Ave. NY	3
ALBYNYWA	Albany-Washington Ave. NY	7	NYCKNYAL	Albemarle Rd. NY	4	HDSNNYHD	Hudson NY	3
NYCKNYBR	Bridge St. NY	7	NYCKNYAR	Ave. R NY	4	NYCQNY!A	J. F. Kennedy NY	3
BFLONYFR	Buffalo-Franklin St. NY	7	NYCKNYAU	Ave. U NY	4	NYCXNYKB	Kingsbridge Ave. NY	3
BRWDNYBW	Central Islip NY	7	BBYLNYBN	Babylon NY	4	NYCKNYLA	Liberty Ave. NY	3
NYCXNYCR	Cruger Ave. NY	7	BALSNYBA	Ballston Spa NY	4	MNHSNYMH	Manhasset NY	3
FRDLNYFM	Farmingdale NY	7	BYSHNYBY	Bayshore NY	4	NWBRNYNW	Newburgh NY	3
NYCQNYFL	Flushing NY	7	BFLONYMA	Buffalo-Main St. NY	4	NGFLNYPO	Niagara Falls-Portage NY	3
FRPTNYFP	Freeport NY	7	BFLONYSP	Buffalo-S. Park Ave. NY	4	ONEDNYOD	Oneida NY	3
GRCYNYGC	Garden City NY	7	NYCQNYCO	Corona NY	4	ORPKNYST	Orchard Park NY	3
ALBYNYGD	Guilderland NY	7	DBFYNYDF	Dobbs Ferry NY	4	OSNGNYOS	Ossining NY	3
NYCKNYKP	Kenmore Pl. NY	7	NYCXNYMH	E. 150Th St. NY	4	PLBGNYPB	Plattsburgh NY	3
PCHGNYPH	Patchogue NY	7	NYCXNYJE	E. 167Th St. NY	4	PTWANYPW	Port Washington NY	3
SCHNNYSC	Schenectady-Clinton St. NY	7	GNBGNYFV	Fairview Park NY	4	PRDYNYPD	Purdys NY	3
NYCXNYTR	Tratman Ave. NY	7	NYCXNYGC	Grand Concourse NY	4	RVHDNYRV	Riverhead NY	3
WBYNNYWE	Westbury NY	7	HRSNNYHN	Harrison NY	4	NYCKNYRA	Rockaway Ave. NY	3
ALBYNYSS	Albany-State St. NY	6	NYCQNYJA	Jamaica NY	4	ROMENYRM	Rome NY	3
NYCKNYCL	Clinton Ave. NY	6	LNCSNYLC	Lancaster NY	4	NYCRNYSS	S. Staten Island NY	3
FLPKNYFP	Floral Park NY	6	LTHMNYTS	Latham NY	4	SLDNNYSE	Selden NY	3
NYCQNYFH	Forest Hills NY	6	NYCQNYLN	Laurelton NY	4	SPVYNYSV	Spring Valley NY	3
GRNKNYGN	Great Neck NY	6	LVTWNYLT	Levittown NY	4	SYRCNYEP	Syracuse-Electronics Pkwy. NY	3
NYCQNYLI	L. I. C. NY	6	LHSTNYLH	Lindenhurst NY	4	CMLSNYON	Syracuse-Fairmount NY	3
NYCMNYMN	Manhattan Ave. NY	6	LNBHNYLB	Long Beach NY	4	SYRCNYSA	Syracuse-S. Salina NY	3
NWRCNYNR	New Rochelle NY	6	MTKSNYMK	Mount Kisco NY	4	NYCMNYTH	Thayer St. NY	3
NYCQNYNW	Newtown NY	6	NGRNNYNG	N. Greenbush NY	4	NYCKNYTY	Troy Ave. NY	3
PLVWNYPV	Plainview NY	6	NYCQNYNJ	N. Jamaica NY	4	TROYNY04	Troy-Fourth St. NY	3
PTCHNYPC	Port Chester NY	6	NYCRNYNS	N. Staten Island NY	4	NYCRNYSS	W. Staten Island NY	3
RNKNNYRN	Ronkonkoma NY	6	NYCRNYND	New Dorp NY	4	WTTWNYUN	Watertown NY	3
SYVLNYSA	Sayville NY	6	NYACNYNK	Nyack NY	4	WDMRNYFR	Woodmere NY	3
SMTWNYSM	Smithtown NY	6	NYCMNYPS	Pearl St. NY	4	**Frontier of Rochester Service Territory****		
SYOSNYSY	Syosset NY	6	SRSPNYSR	Saratoga NY	4	** FTR CLEC Counts May Be Overstated		
NYCKNY14	14Th St. NY	5	SCDLNYSR	Scarsdale NY	4	BITNNYXA	Rochester -BHTL	4
NYCKNY71	71St St. NY	5	SYRCNYJS	Syracuse-James St. NY	4	ROCHNYXK	Rochester - Pixley Rd	4
NYCKNY77	77Th St. NY	5	TRTWNYTT	Tarrytown NY	4	ERCHNYXA	Fairport	3
AMHRNYMP	Amherst NY	5	NYCXNYTB	Tiebout Ave. NY	4	FAPTNYXB	Pennton	3
NYCQNYAS	Astoria NY	5	TNWNNYTW	Tonawanda NY	4	HNRTNYXA	Erie Station	3
NYCKNYAY	Ave. Y NY	5	TKHONYTU	Tuckahoe NY	4	ROCHNYXB	Rochester - Stone	3
NYCQNYBA	Bayside NY	5	UTICNYUT	Utica NY	4	ROCHNYXF	Rochester - Norton	3

Staff List of Wire Centers With 3 or More CLEC Switches
Serving Residential Customers Only
per TRO Footnote 432

CLLI Code	Wire Center Name	Count
NYCMNY30	E. 30Th St. NY	4
NYCMNY37	E. 37Th St. NY	4
ALBYNYGD	Guilderland NY	3
ALBYNYSS	Albany-State St. NY	3
ALBYNYWA	Albany-Washington Ave. NY	3
FLPKNYFP	Floral Park NY	3
FRPTNYFP	Freeport NY	3
HMPSNYHS	Hempstead NY	3
HNSTNYHU	Huntington NY	3
LYBRNYLB	Lynbrook NY	3
MINLNYMI	Mineola NY	3
NYCMNY13	Second Ave. NY	3
NYCMNY18	W. 18Th St. NY	3
NYCMNY36	W. 36Th St. NY	3
NYCMNY42	W. 42Nd St. NY	3
NYCMNY50	W. 50Th St. NY	3
NYCMNY56	E. 56Th St. NY	3
NYCMNYWS	140 West St. NY	3
PCHGNYPH	Patchogue NY	3

Frontier of Rochester Service Territory
No Wire Centers with 3 or More CLECs

* update November 17, 2003 list of routes having 3 or more
* transport facilities of any type
```
    if transports>=3
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219	routes	total count	inter lata routes	Rochester routes	applicable Verizon routes
		219	35	57	135
1	ALBYNYGD,ALBYNYSS	3			yes
2	ALBYNYGD,BFLONYFR	3	inter lata		
3	ALBYNYGD,BFLONYHE	3	inter lata		
4	ALBYNYGD,BFLONYMA	3	inter lata		
5	ALBYNYGD,SCHNNYSC	3			yes
6	ALBYNYGD,SYRCNYEP	3	inter lata		
7	ALBYNYGD,SYRCNYSU	3	inter lata		
8	ALBYNYGD,WSVLNYNC	3	inter lata		
9	ALBYNYSS,ALBYNYWA	3			yes
10	ALBYNYSS,BFLONYFR	4	inter lata		
11	ALBYNYSS,BFLONYHE	3	inter lata		
12	ALBYNYSS,BFLONYMA	3	inter lata		
13	ALBYNYSS,BITNNYXA	3	inter lata	rochester	
14	ALBYNYSS,ERCHNYXA	3	inter lata	rochester	
15	ALBYNYSS,NYCMNY36	3	inter lata		
16	ALBYNYSS,ROCHNYXA	3	inter lata	rochester	
17	ALBYNYSS,ROCHNYXB	3	inter lata	rochester	
18	ALBYNYSS,SCHNNYSC	3			yes
19	ALBYNYSS,SYRCNYEP	3	inter lata		
20	ALBYNYSS,SYRCNYSU	5	inter lata		
21	ALBYNYSS,TROYNY04	3			yes
22	ALBYNYSS,WSVLNYNC	3	inter lata		
23	AMHRNYMP,BFLONYFR	3			yes
24	AMHRNYMP,BFLONYHE	3			yes
25	AMHRNYMP,WSVLNYNC	3			yes
26	BFLONYBA,BFLONYEL	3			yes
27	BFLONYBA,BFLONYFR	3			yes
28	BFLONYBA,BFLONYHE	3			yes
29	BFLONYBA,WSNCNYUN	3			yes
30	BFLONYBA,WSVLNYNC	3			yes
31	BFLONYEL,BFLONYFR	3			yes
32	BFLONYEL,BFLONYHE	3			yes
33	BFLONYEL,WSNCNYUN	3			yes
34	BFLONYEL,WSVLNYNC	3			yes
35	BFLONYFR,BFLONYHE	4			yes
36	BFLONYFR,BFLONYMA	3			yes
37	BFLONYFR,BITNNYXA	3		rochester	
38	BFLONYFR,ERCHNYXA	3		rochester	
39	BFLONYFR,ROCHNYXA	3		rochester	
40	BFLONYFR,ROCHNYXB	3		rochester	
41	BFLONYFR,SCHNNYSC	3	inter lata		
42	BFLONYFR,SYRCNYEP	3	inter lata		
43	BFLONYFR,SYRCNYSU	4	inter lata		
44	BFLONYFR,WSNCNYUN	3			yes
45	BFLONYFR,WSVLNYNC	4			yes
46	BFLONYHE,BFLONYMA	3			yes
47	BFLONYHE,SCHNNYSC	3	inter lata		
48	BFLONYHE,SYRCNYEP	3	inter lata		
49	BFLONYHE,SYRCNYSU	3	inter lata		
50	BFLONYHE,WSNCNYUN	2			yes
51	BFLONYHE,WSVLNYNC	4			yes
52	BFLONYMA,SCHNNYSC	3	inter lata		
53	BFLONYMA,SYRCNYEP	3	inter lata		
54	BFLONYMA,SYRCNYSU	3	inter lata		
55	BFLONYMA,WSVLNYNC	3			yes
56	BITNNYXA,ERCHNYXA	5		rochester	
57	BITNNYXA,ROCHNYXA	4		rochester	
58	BITNNYXA,ROCHNYXB	5		rochester	
59	BITNNYXA,ROCHNYXC	3		rochester	
60	BITNNYXA,ROCHNYXD	4		rochester	
61	BITNNYXA,ROCHNYXF	4		rochester	
62	BITNNYXA,ROCHNYXH	4		rochester	
63	BITNNYXA,ROCHNYXK	4		rochester	
64	BITNNYXA,SYRCNYSU	3	inter lata	rochester	
65	BITNNYXA,WBSTNYXA	4		rochester	
66	BRWDNYBW,DRPKNYDP	3			yes
67	BRWDNYBW,GRCYNYGC	3			yes

routes	total count	inter lata routes	Rochester routes	applicable Verizon routes
68 BRWDNYBW,NYCMNY56	5			yes
69 BRWDNYBW,NYCMNYVS	3			yes
70 BRWDNYBW,WHPLNYWP	3			yes
71 DRPKNYDP,NYCMNY56	3			yes
72 ERCHNYXA,ROCHNYXA	4		rochester	
73 ERCHNYXA,ROCHNYXB	5		rochester	
74 ERCHNYXA,ROCHNYXC	3		rochester	
75 ERCHNYXA,ROCHNYXD	4		rochester	
76 ERCHNYXA,ROCHNYXF	4		rochester	
77 ERCHNYXA,ROCHNYXH	4		rochester	
78 ERCHNYXA,ROCHNYXK	4		rochester	
79 ERCHNYXA,SYRCNYSU	3	inter lata	rochester	
80 ERCHNYXA,WBSTNYXA	4		rochester	
81 GRCYNYGC,MINLNYMI	4			yes
82 GRCYNYGC,NYCMNY56	4			yes
83 GRCYNYGC,NYCMNYBS	3			yes
84 GRCYNYGC,NYCMNYVS	3			yes
85 GRCYNYGC,WHPLNYWP	3			yes
86 MINLNYMI,NYCMNY56	3			yes
87 MINLNYMI,WHPLNYWP	3			yes
88 NYCKNYBR,NYCMNY13	3			yes
89 NYCKNYBR,NYCMNY18	5			yes
90 NYCKNYBR,NYCMNY30	3			yes
91 NYCKNYBR,NYCMNY36	3			yes
92 NYCKNYBR,NYCMNY37	3			yes
93 NYCKNYBR,NYCMNY42	3			yes
94 NYCKNYBR,NYCMNY50	3			yes
95 NYCKNYBR,NYCMNY56	3			yes
96 NYCKNYBR,NYCMNY79	3			yes
97 NYCKNYBR,NYCMNYBS	4			yes
98 NYCKNYBR,NYCMNYVS	3			yes
99 NYCKNYBR,NYCMNYWS	3			yes
100 NYCKNYBR,WHPLNYWP	3			yes
101 NYCMNY13,NYCMNY18	5			yes
102 NYCMNY13,NYCMNY30	8			yes
103 NYCMNY13,NYCMNY36	6			yes
104 NYCMNY13,NYCMNY37	6			yes
105 NYCMNY13,NYCMNY42	6			yes
106 NYCMNY13,NYCMNY50	6			yes
107 NYCMNY13,NYCMNY56	6			yes
108 NYCMNY13,NYCMNY79	3			yes
109 NYCMNY13,NYCMNYBS	6			yes
110 NYCMNY13,NYCMNYVS	3			yes
111 NYCMNY13,NYCMNYWS	8			yes
112 NYCMNY13,WHPLNYWP	3			yes
113 NYCMNY18,NYCMNY30	5			yes
114 NYCMNY18,NYCMNY36	6			yes
115 NYCMNY18,NYCMNY37	5			yes
116 NYCMNY18,NYCMNY42	5			yes
117 NYCMNY18,NYCMNY50	5			yes
118 NYCMNY18,NYCMNY56	5			yes
119 NYCMNY18,NYCMNY79	4			yes
120 NYCMNY18,NYCMNYBS	5			yes
121 NYCMNY18,NYCMNYVS	6			yes
122 NYCMNY18,NYCMNYWS	5			yes
123 NYCMNY18,WHPLNYWP	4			yes
124 NYCMNY30,NYCMNY36	7			yes
125 NYCMNY30,NYCMNY37	8			yes
126 NYCMNY30,NYCMNY42	9			yes
127 NYCMNY30,NYCMNY50	6			yes
128 NYCMNY30,NYCMNY56	6			yes
129 NYCMNY30,NYCMNY79	3			yes
130 NYCMNY30,NYCMNYBS	6			yes
131 NYCMNY30,NYCMNYVS	3			yes
132 NYCMNY30,NYCMNYWS	6			yes
133 NYCMNY30,WHPLNYWP	3			yes
134 NYCMNY36,NYCMNY37	8			yes
135 NYCMNY36,NYCMNY42	12			yes
136 NYCMNY36,NYCMNY50	7			yes
137 NYCMNY36,NYCMNY56	6			yes
138 NYCMNY36,NYCMNY79	3			yes
139 NYCMNY36,NYCMNYBS	6			yes
140 NYCMNY36,NYCMNYVS	3			yes
141 NYCMNY36,NYCMNYWS	6			yes

routes	total count	inter lata routes	Rochester routes	applicable Verizon routes
142 NYCMNY36,WHPLNYWP	3			yes
143 NYCMNY37,NYCMNY42	7			yes
144 NYCMNY37,NYCMNY50	6			yes
145 NYCMNY37,NYCMNY56	8			yes
146 NYCMNY37,NYCMNY79	3			yes
147 NYCMNY37,NYCMNY97	3			yes
148 NYCMNY37,NYCMNYBS	6			yes
149 NYCMNY37,NYCMNYVS	3			yes
150 NYCMNY37,NYCMNYWS	7			yes
151 NYCMNY37,WHPLNYWP	3			yes
152 NYCMNY42,NYCMNY50	6			yes
153 NYCMNY42,NYCMNY56	6			yes
154 NYCMNY42,NYCMNY79	3			yes
155 NYCMNY42,NYCMNYBS	6			yes
156 NYCMNY42,NYCMNYVS	3			yes
157 NYCMNY42,NYCMNYWS	6			yes
158 NYCMNY42,WHPLNYWP	3			yes
159 NYCMNY50,NYCMNY56	8			yes
160 NYCMNY50,NYCMNY73	4			yes
161 NYCMNY50,NYCMNY79	6			yes
162 NYCMNY50,NYCMNYBS	7			yes
163 NYCMNY50,NYCMNYVS	3			yes
164 NYCMNY50,NYCMNYWS	6			yes
165 NYCMNY50,WHPLNYWP	3			yes
166 NYCMNY56,NYCMNY73	4			yes
167 NYCMNY56,NYCMNY79	6			yes
168 NYCMNY56,NYCMNYBS	7			yes
169 NYCMNY56,NYCMNYVS	5			yes
170 NYCMNY56,NYCMNYWS	7			yes
171 NYCMNY56,WHPLNYWP	5			yes
172 NYCMNY73,NYCMNY79	4			yes
173 NYCMNY79,NYCMNYBS	3			yes
174 NYCMNY79,NYCMNYVS	3			yes
175 NYCMNY79,NYCMNYWS	3			yes
176 NYCMNY79,WHPLNYWP	3			yes
177 NYCMNYBS,NYCMNYVS	3			yes
178 NYCMNYBS,NYCMNYWS	8			yes
179 NYCMNYBS,WHPLNYWP	4			yes
180 NYCMNYVS,NYCMNYWS	3			yes
181 NYCMNYVS,WHPLNYWP	5			yes
182 NYCMNYWS,WHPLNYWP	3			yes
183 ROCHNYXA,ROCHNYXB	4		rochester	
184 ROCHNYXA,ROCHNYXC	3		rochester	
185 ROCHNYXA,ROCHNYXD	3		rochester	
186 ROCHNYXA,ROCHNYXF	3		rochester	
187 ROCHNYXA,ROCHNYXH	3		rochester	
188 ROCHNYXA,ROCHNYXK	3		rochester	
189 ROCHNYXA,SYRCNYSU	3	inter lata	rochester	
190 ROCHNYXA,WBSTNYXA	3		rochester	
191 ROCHNYXB,ROCHNYXC	3		rochester	
192 ROCHNYXB,ROCHNYXD	4		rochester	
193 ROCHNYXB,ROCHNYXF	4		rochester	
194 ROCHNYXB,ROCHNYXH	4		rochester	
195 ROCHNYXB,ROCHNYXK	4		rochester	
196 ROCHNYXB,SYRCNYSU	3	inter lata	rochester	
197 ROCHNYXB,WBSTNYXA	4		rochester	
198 ROCHNYXC,ROCHNYXD	3		rochester	
199 ROCHNYXC,ROCHNYXF	3		rochester	
200 ROCHNYXC,ROCHNYXH	3		rochester	
201 ROCHNYXC,ROCHNYXK	3		rochester	
202 ROCHNYXC,WBSTNYXA	3		rochester	
203 ROCHNYXD,ROCHNYXF	4		rochester	
204 ROCHNYXD,ROCHNYXH	4		rochester	
205 ROCHNYXD,ROCHNYXK	4		rochester	
206 ROCHNYXD,WBSTNYXA	4		rochester	
207 ROCHNYXF,ROCHNYXH	4		rochester	
208 ROCHNYXF,ROCHNYXK	4		rochester	
209 ROCHNYXF,WBSTNYXA	4		rochester	
210 ROCHNYXH,ROCHNYXK	4		rochester	
211 ROCHNYXH,WBSTNYXA	4		rochester	
212 ROCHNYXK,WBSTNYXA	4		rochester	
213 SCHNNYSC,SYRCNYEP	3	inter lata		
214 SCHNNYSC,SYRCNYSU	3	inter lata		
215 SCHNNYSC,WSVLNYNC	3	inter lata		
216 SYRCNYEP,SYRCNYSU	3			yes
217 SYRCNYEP,WSVLNYNC	3	inter lata		
218 SYRCNYSU,WSVLNYNC	3	inter lata		
219 WSNCNYUN,WSVLNYNC	3			yes

- Competitive wholesale facilities trigger for dedicated DS1 transport
- FCC Rules, Section 51.319 (e) (1) (ii)

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if count_ds1_w>=2
```

36	routes	total count	inter lata routes	Rochester routes	applicable Verizon routes
		36	0	0	36
1	NYCMNY13,NYCMNY30	8			yes
2	NYCMNY13,NYCMNY36	6			yes
3	NYCMNY13,NYCMNY37	6			yes
4	NYCMNY13,NYCMNY42	6			yes
5	NYCMNY13,NYCMNY50	6			yes
6	NYCMNY13,NYCMNY56	6			yes
7	NYCMNY13,NYCMNYBS	6			yes
8	NYCMNY13,NYCMNYWS	8			yes
9	NYCMNY30,NYCMNY36	7			yes
10	NYCMNY30,NYCMNY37	8			yes
11	NYCMNY30,NYCMNY42	9			yes
12	NYCMNY30,NYCMNY50	6			yes
13	NYCMNY30,NYCMNY56	6			yes
14	NYCMNY30,NYCMNYBS	6			yes
15	NYCMNY30,NYCMNYWS	6			yes
16	NYCMNY36,NYCMNY37	8			yes
17	NYCMNY36,NYCMNY42	12			yes
18	NYCMNY36,NYCMNY50	7			yes
19	NYCMNY36,NYCMNY56	6			yes
20	NYCMNY36,NYCMNYBS	6			yes
21	NYCMNY36,NYCMNYWS	6			yes
22	NYCMNY37,NYCMNY42	7			yes
23	NYCMNY37,NYCMNY50	6			yes
24	NYCMNY37,NYCMNY56	8			yes
25	NYCMNY37,NYCMNYBS	6			yes
26	NYCMNY37,NYCMNYWS	7			yes
27	NYCMNY42,NYCMNY50	6			yes
28	NYCMNY42,NYCMNY56	6			yes
29	NYCMNY42,NYCMNYBS	6			yes
30	NYCMNY42,NYCMNYWS	6			yes
31	NYCMNY50,NYCMNY56	8			yes
32	NYCMNY50,NYCMNYBS	7			yes
33	NYCMNY50,NYCMNYWS	6			yes
34	NYCMNY56,NYCMNYBS	7			yes
35	NYCMNY56,NYCMNYWS	7			yes
36	NYCMNYBS,NYCMNYWS	8			yes

* Self-provisioning trigger for dedicated DS3 transport
* FCC Rules, Section 51.319 (e) (2) (i) (A)

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if count_ds3_sp>=3
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76	routes	total count	inter lata routes	Rochester routes	applicable Verizon routes
		76	0	28	48
1	ALBYNYSS,SYRCNYSU	5			yes
2	BFLONYFR,BFLONYHE	4			yes
3	BFLONYFR,WSVLNYNC	4			yes
4	BFLONYHE,WSVLNYNC	4			yes
5	BITNNYXA,ERCHNYXA	5		rochester	
6	BITNNYXA,ROCHNYXB	5		rochester	
7	BITNNYXA,ROCHNYXD	4		rochester	
8	BITNNYXA,ROCHNYXF	4		rochester	
9	BITNNYXA,ROCHNYXH	4		rochester	
10	BITNNYXA,ROCHNYXK	4		rochester	
11	BITNNYXA,WBSTNYXA	4		rochester	
12	ERCHNYXA,ROCHNYXB	5		rochester	
13	ERCHNYXA,ROCHNYXD	4		rochester	
14	ERCHNYXA,ROCHNYXF	4		rochester	
15	ERCHNYXA,ROCHNYXH	4		rochester	
16	ERCHNYXA,ROCHNYXK	4		rochester	
17	ERCHNYXA,WBSTNYXA	4		rochester	
18	NYCKNYBR,NYCMNY18	5			yes
19	NYCKNYBR,NYCMNYBS	4			yes
20	NYCKNYBR,NYCMNYWS	3			yes
21	NYCMNY13,NYCMNY30	8			yes
22	NYCMNY13,NYCMNY36	6			yes
23	NYCMNY13,NYCMNY37	6			yes
24	NYCMNY13,NYCMNY42	6			yes
25	NYCMNY13,NYCMNY50	6			yes
26	NYCMNY13,NYCMNY56	6			yes
27	NYCMNY13,NYCMNYBS	6			yes
28	NYCMNY13,NYCMNYWS	8			yes
29	NYCMNY18,NYCMNY36	6			yes
30	NYCMNY18,NYCMNYWS	5			yes
31	NYCMNY30,NYCMNY36	7			yes
32	NYCMNY30,NYCMNY37	8			yes
33	NYCMNY30,NYCMNY42	9			yes
34	NYCMNY30,NYCMNY50	6			yes
35	NYCMNY30,NYCMNY56	6			yes
36	NYCMNY30,NYCMNYBS	6			yes
37	NYCMNY30,NYCMNYWS	6			yes
38	NYCMNY36,NYCMNY37	9			yes
39	NYCMNY36,NYCMNY42	12			yes
40	NYCMNY36,NYCMNY50	7			yes
41	NYCMNY36,NYCMNY56	6			yes
42	NYCMNY36,NYCMNYBS	6			yes
43	NYCMNY36,NYCMNYWS	6			yes
44	NYCMNY37,NYCMNY42	7			yes
45	NYCMNY37,NYCMNY50	6			yes
46	NYCMNY37,NYCMNY56	8			yes
47	NYCMNY37,NYCMNYBS	6			yes
48	NYCMNY37,NYCMNYWS	7			yes
49	NYCMNY42,NYCMNY50	6			yes
50	NYCMNY42,NYCMNY56	6			yes
51	NYCMNY42,NYCMNYBS	6			yes
52	NYCMNY42,NYCMNYWS	6			yes
53	NYCMNY50,NYCMNY56	8			yes
54	NYCMNY50,NYCMNYBS	7			yes
55	NYCMNY50,NYCMNYWS	6			yes
56	NYCMNY56,NYCMNYBS	7			yes
57	NYCMNY56,NYCMNYWS	7			yes
58	NYCMNY79,NYCMNYWS	3			yes
59	NYCMNYBS,NYCMNYWS	8			yes
60	NYCMNYVS,NYCMNYWS	3			yes
61	NYCMNYVS,WHPLNYWP	5			yes
62	ROCHNYXB,ROCHNYXD	4		rochester	
63	ROCHNYXB,ROCHNYXF	4		rochester	
64	ROCHNYXB,ROCHNYXH	4		rochester	
65	ROCHNYXB,ROCHNYXK	4		rochester	
66	ROCHNYXB,WBSTNYXA	4		rochester	
67	ROCHNYXD,ROCHNYXF	4		rochester	
68	ROCHNYXD,ROCHNYXH	4		rochester	
69	ROCHNYXD,ROCHNYXK	4		rochester	
70	ROCHNYXD,WBSTNYXA	4		rochester	
71	ROCHNYXF,ROCHNYXH	4		rochester	
72	ROCHNYXF,ROCHNYXK	4		rochester	
73	ROCHNYXF,WBSTNYXA	4		rochester	
74	ROCHNYXH,ROCHNYXK	4		rochester	
75	ROCHNYXH,WBSTNYXA	4		rochester	
76	ROCHNYXK,WBSTNYXA	4		rochester	

* Competitive wholesale facilities trigger for dedicated DS3 transport
* FCC Rules, Section 51.319 (e) (2) (i) (B)

```
if count_ds3_w>=2
```

37	routes	total count	inter lata routes	Rochester routes	applicable Verizon routes
		37	0	0	37
1	NYCMNY13,NYCMNY30	8			yes
2	NYCMNY13,NYCMNY36	6			yes
3	NYCMNY13,NYCMNY37	6			yes
4	NYCMNY13,NYCMNY42	6			yes
5	NYCMNY13,NYCMNY50	6			yes
6	NYCMNY13,NYCMNY56	6			yes
7	NYCMNY13,NYCMNYBS	6			yes
8	NYCMNY13,NYCMNYWS	8			yes
9	NYCMNY18,NYCMNY36	6			yes
10	NYCMNY30,NYCMNY36	7			yes
11	NYCMNY30,NYCMNY37	8			yes
12	NYCMNY30,NYCMNY42	9			yes
13	NYCMNY30,NYCMNY50	6			yes
14	NYCMNY30,NYCMNY56	6			yes
15	NYCMNY30,NYCMNYBS	6			yes
16	NYCMNY30,NYCMNYWS	6			yes
17	NYCMNY36,NYCMNY37	8			yes
18	NYCMNY36,NYCMNY42	12			yes
19	NYCMNY36,NYCMNY50	7			yes
20	NYCMNY36,NYCMNY56	6			yes
21	NYCMNY36,NYCMNYBS	6			yes
22	NYCMNY36,NYCMNYWS	6			yes
23	NYCMNY37,NYCMNY42	7			yes
24	NYCMNY37,NYCMNY50	6			yes
25	NYCMNY37,NYCMNY56	8			yes
26	NYCMNY37,NYCMNYBS	6			yes
27	NYCMNY37,NYCMNYWS	7			yes
28	NYCMNY42,NYCMNY50	6			yes
29	NYCMNY42,NYCMNY56	6			yes
30	NYCMNY42,NYCMNYBS	6			yes
31	NYCMNY42,NYCMNYWS	6			yes
32	NYCMNY50,NYCMNY56	8			yes
33	NYCMNY50,NYCMNYBS	7			yes
34	NYCMNY50,NYCMNYWS	6			yes
35	NYCMNY56,NYCMNYBS	7			yes
36	NYCMNY56,NYCMNYWS	7			yes
37	NYCMNYBS,NYCMNYWS	8			yes

* Self-provisioning trigger for dark fiber transport
* FCC Rules, Section 51.319 (e) (3) (i) (A)

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if count_df_sp>=3
```

72	routes	total count	inter lata routes	Rochester routes	applicable Verizon routes
		72	26	0	46
1	ALBYNYGD,ALBYNYSS	3			yes
2	ALBYNYGD,BFLONYFR	3	inter lata		
3	ALBYNYGD,BFLONYHE	3	inter lata		
4	ALBYNYGD,BFLONYMA	3	inter lata		
5	ALBYNYGD,SCHNNYSC	3			yes
6	ALBYNYGD,SYRCNYEP	3	inter lata		
7	ALBYNYGD,SYRCNYSU	3	inter lata		
8	ALBYNYGD,WSVLNYNC	3	inter lata		
9	ALBYNYSS,ALBYNYWA	3			yes
10	ALBYNYSS,BFLONYFR	4	inter lata		
11	ALBYNYSS,BFLONYHE	3	inter lata		
12	ALBYNYSS,BFLONYMA	3	inter lata		
13	ALBYNYSS,SCHNNYSC	3			yes
14	ALBYNYSS,SYRCNYEP	3	inter lata		
15	ALBYNYSS,SYRCNYSU	5	inter lata		
16	ALBYNYSS,TROYNY04	3			yes
17	ALBYNYSS,WSVLNYNC	3	inter lata		
18	BFLONYFR,BFLONYHE	4			yes
19	BFLONYFR,BFLONYMA	3			yes
20	BFLONYFR,SCHNNYSC	3	inter lata		
21	BFLONYFR,SYRCNYEP	3	inter lata		
22	BFLONYFR,SYRCNYSU	4	inter lata		
23	BFLONYFR,WSVLNYNC	4			yes
24	BFLONYHE,BFLONYMA	3			yes
25	BFLONYHE,SCHNNYSC	3	inter lata		
26	BFLONYHE,SYRCNYEP	3	inter lata		
27	BFLONYHE,SYRCNYSU	3	inter lata		
28	BFLONYHE,WSVLNYNC	4			yes
29	BFLONYMA,SCHNNYSC	3	inter lata		
30	BFLONYMA,SYRCNYEP	3	inter lata		
31	BFLONYMA,SYRCNYSU	3	inter lata		
32	BFLONYMA,WSVLNYNC	3			yes
33	NYCMNY13,NYCMNY18	5			yes
34	NYCMNY13,NYCMNY30	8			yes
35	NYCMNY13,NYCMNYWS	8			yes
36	NYCMNY18,NYCMNY30	5			yes
37	NYCMNY18,NYCMNY36	6			yes
38	NYCMNY18,NYCMNY37	5			yes
39	NYCMNY18,NYCMNY42	5			yes
40	NYCMNY18,NYCMNY50	5			yes
41	NYCMNY18,NYCMNY56	5			yes
42	NYCMNY18,NYCMNY79	4			yes
43	NYCMNY18,NYCMNYBS	5			yes
44	NYCMNY18,NYCMNYVS	6			yes
45	NYCMNY18,NYCMNYWS	5			yes
46	NYCMNY18,WHPLNYWP	4			yes
47	NYCMNY30,NYCMNY36	7			yes
48	NYCMNY30,NYCMNY37	8			yes
49	NYCMNY30,NYCMNY42	9			yes
50	NYCMNY36,NYCMNY37	8			yes
51	NYCMNY36,NYCMNY42	12			yes
52	NYCMNY36,NYCMNY50	7			yes
53	NYCMNY37,NYCMNY42	7			yes
54	NYCMNY37,NYCMNY56	8			yes
55	NYCMNY37,NYCMNYWS	7			yes
56	NYCMNY50,NYCMNY56	8			yes
57	NYCMNY50,NYCMNY73	4			yes
58	NYCMNY50,NYCMNY79	6			yes
59	NYCMNY50,NYCMNYBS	7			yes
60	NYCMNY56,NYCMNY73	4			yes
61	NYCMNY56,NYCMNY79	6			yes
62	NYCMNY56,NYCMNYBS	7			yes
63	NYCMNY56,NYCMNYWS	7			yes
64	NYCMNY73,NYCMNY79	4			yes
65	NYCMNYBS,NYCMNYWS	8			yes
66	NYCMNYBS,WHPLNYWP	4			yes
67	SCHNNYSC,SYRCNYEP	3	inter lata		
68	SCHNNYSC,SYRCNYSU	3	inter lata		
69	SCHNNYSC,WSVLNYNC	3	inter lata		
70	SYRCNYEP,SYRCNYSU	3			yes
71	SYRCNYEP,WSVLNYNC	3	inter lata		
72	SYRCNYSU,WSVLNYNC	3	inter lata		

* Competitive wholesale facilities trigger for dark fiber transport
* FCC Rules, Section 51.319 (e) (3) (i) (B)

```
if count_df_w>=2
```

	routes	total count	inter lata routes	Rochester routes	applicable Verizon routes
0		0	0	0	0

no observations

* Any of 5 triggers for dedicated DS1, DS3, dark fiber transport
* FCC Rules, Section 51.319 (e) (1), (2) & (3)
  if count_ds1_w>=2 or count_ds3_sp>=3 or count_ds3_w>=2
    or count df_sp>=3 or count df_w>=2

126	route	total count	inter lata routes	Rochester routes	applicable Verizon routes
		126	26	28	72
1	ALBYNYGD,ALBYNYSS	3			yes
2	ALBYNYGD,BFLONYFR	3	inter lata		
3	ALBYNYGD,BFLONYHE	3	inter lata		
4	ALBYNYGD,BFLONYMA	3	inter lata		
5	ALBYNYGD,SCHNNYSC	3			yes
6	ALBYNYGD,SYRCNYEP	3	inter lata		
7	ALBYNYGD,SYRCNYSU	3	inter lata		
8	ALBYNYGD,WSVLNYNC	3	inter lata		
9	ALBYNYSS,ALBYNYWA	3			yes
10	ALBYNYSS,BFLONYFR	4	inter lata		
11	ALBYNYSS,BFLONYHE	3	inter lata		
12	ALBYNYSS,BFLONYMA	3	inter lata		
13	ALBYNYSS,SCHNNYSC	3			yes
14	ALBYNYSS,SYRCNYEP	3	inter lata		
15	ALBYNYSS,SYRCNYSU	5	inter lata		
16	ALBYNYSS,TROYNY04	3			yes
17	ALBYNYSS,WSVLNYNC	3	inter lata		
18	BFLONYFR,BFLONYHE	4			yes
19	BFLONYFR,BFLONYMA	3			yes
20	BFLONYFR,SCHNNYSC	3	inter lata		
21	BFLONYFR,SYRCNYEP	3	inter lata		
22	BFLONYFR,SYRCNYSU	4	inter lata		
23	BFLONYFR,WSVLNYNC	4			yes
24	BFLONYHE,BFLONYMA	3			yes
25	BFLONYHE,SCHNNYSC	3	inter lata		
26	BFLONYHE,SYRCNYEP	3	inter lata		
27	BFLONYHE,SYRCNYSU	3	inter lata		
28	BFLONYHE,WSVLNYNC	4			yes
29	BFLONYMA,SCHNNYSC	3	inter lata		
30	BFLONYMA,SYRCNYEP	3	inter lata		
31	BFLONYMA,SYRCNYSU	3	inter lata		
32	BFLONYMA,WSVLNYNC	3			yes
33	BITNNYXA,ERCHNYXA	5		rochester	
34	BITNNYXA,ROCHNYXB	5		rochester	
35	BITNNYXA,ROCHNYXD	4		rochester	
36	BITNNYXA,ROCHNYXF	4		rochester	
37	BITNNYXA,ROCHNYXH	4		rochester	
38	BITNNYXA,ROCHNYXK	4		rochester	
39	BITNNYXA,WBSTNYXA	4		rochester	
40	ERCHNYXA,ROCHNYXB	5		rochester	
41	ERCHNYXA,ROCHNYXD	4		rochester	
42	ERCHNYXA,ROCHNYXF	4		rochester	
43	ERCHNYXA,ROCHNYXH	4		rochester	
44	ERCHNYXA,ROCHNYXK	4		rochester	
45	ERCHNYXA,WBSTNYXA	4		rochester	
46	NYCKNYBR,NYCMNY18	5			yes
47	NYCKNYBR,NYCMNYBS	4			yes
48	NYCKNYBR,NYCMNYWS	3			yes
49	NYCMNY13,NYCMNY18	5			yes
50	NYCMNY13,NYCMNY30	8			yes
51	NYCMNY13,NYCMNY36	6			yes
52	NYCMNY13,NYCMNY37	6			yes
53	NYCMNY13,NYCMNY42	6			yes
54	NYCMNY13,NYCMNY50	6			yes
55	NYCMNY13,NYCMNY56	6			yes
56	NYCMNY13,NYCMNYBS	6			yes
57	NYCMNY13,NYCMNYWS	8			yes
58	NYCMNY18,NYCMNY30	5			yes

route	total count	inter lata routes	Rochester routes	applicable Verizon routes
59 NYCMNY18,NYCMNY36	6			yes
60 NYCMNY18,NYCMNY37	5			yes
61 NYCMNY18,NYCMNY42	5			yes
62 NYCMNY18,NYCMNY50	5			yes
63 NYCMNY18,NYCMNY56	5			yes
64 NYCMNY18,NYCMNY79	4			yes
65 NYCMNY18,NYCMNYBS	5			yes
66 NYCMNY18,NYCMNYVS	6			yes
67 NYCMNY18,NYCMNYWS	5			yes
68 NYCMNY18,WHPLNYWP	4			yes
69 NYCMNY30,NYCMNY36	7			yes
70 NYCMNY30,NYCMNY37	8			yes
71 NYCMNY30,NYCMNY42	9			yes
72 NYCMNY30,NYCMNY50	6			yes
73 NYCMNY30,NYCMNY56	6			yes
74 NYCMNY30,NYCMNYBS	6			yes
75 NYCMNY30,NYCMNYWS	6			yes
76 NYCMNY36,NYCMNY37	8			yes
77 NYCMNY36,NYCMNY42	12			yes
78 NYCMNY36,NYCMNY50	7			yes
79 NYCMNY36,NYCMNY56	6			yes
80 NYCMNY36,NYCMNYBS	6			yes
81 NYCMNY36,NYCMNYWS	6			yes
82 NYCMNY37,NYCMNY42	7			yes
83 NYCMNY37,NYCMNY50	6			yes
84 NYCMNY37,NYCMNY56	8			yes
85 NYCMNY37,NYCMNYBS	6			yes
86 NYCMNY37,NYCMNYWS	7			yes
87 NYCMNY42,NYCMNY50	6			yes
88 NYCMNY42,NYCMNY56	6			yes
89 NYCMNY42,NYCMNYBS	6			yes
90 NYCMNY42,NYCMNYWS	6			yes
91 NYCMNY50,NYCMNY56	8			yes
92 NYCMNY50,NYCMNY73	4			yes
93 NYCMNY50,NYCMNY79	6			yes
94 NYCMNY50,NYCMNYBS	7			yes
95 NYCMNY50,NYCMNYWS	6			yes
96 NYCMNY56,NYCMNY73	4			yes
97 NYCMNY56,NYCMNY79	6			yes
98 NYCMNY56,NYCMNYBS	7			yes
99 NYCMNY56,NYCMNYWS	7			yes
100 NYCMNY73,NYCMNY79	4			yes
101 NYCMNY79,NYCMNYWS	3			yes
102 NYCMNYBS,NYCMNYWS	8			yes
103 NYCMNYBS,WHPLNYWP	4			yes
104 NYCMNYVS,NYCMNYWS	3			yes
105 NYCMNYVS,WHPLNYWP	5			yes
106 ROCHNYXB,ROCHNYXD	4		rochester	
107 ROCHNYXB,ROCHNYXF	4		rochester	
108 ROCHNYXB,ROCHNYXH	4		rochester	
109 ROCHNYXB,ROCHNYXK	4		rochester	
110 ROCHNYXB,WBSTNYXA	4		rochester	
111 ROCHNYXD,ROCHNYXF	4		rochester	
112 ROCHNYXD,ROCHNYXH	4		rochester	
113 ROCHNYXD,ROCHNYXK	4		rochester	
114 ROCHNYXD,WBSTNYXA	4		rochester	
115 ROCHNYXF,ROCHNYXH	4		rochester	
116 ROCHNYXF,ROCHNYXK	4		rochester	
117 ROCHNYXF,WBSTNYXA	4		rochester	
118 ROCHNYXH,ROCHNYXK	4		rochester	
119 ROCHNYXH,WBSTNYXA	4		rochester	
120 ROCHNYXK,WBSTNYXA	4		rochester	
121 SCHNNYSC,SYRCNYEP	3	inter lata		
122 SCHNNYSC,SYRCNYSU	3	inter lata		
123 SCHNNYSC,WSVLNYNC	3	inter lata		
124 SYRCNYEP,SYRCNYSU	3			yes
125 SYRCNYEP,WSVLNYNC	3	inter lata		
126 SYRCNYSU,WSVLNYNC	3	inter lata		

Staff Transport Trigger Analysis Summary
March 2004

* update November 17, 2003 list of routes having 3 or more
* transport facilities of any type
  if transports>=3

	total count	inter lata routes	Rochester routes	applicable Verizon routes
routes	219	35	57	135

* Competitive wholesale facilities trigger for dedicated DS1 transport
* FCC Rules, Section 51.319 (e) (1) (ii)
  if count_ds1_w>=2

	total count	inter lata routes	Rochester routes	applicable Verizon routes
routes	36	0	0	36

* Self-provisioning trigger for dedicated DS3 transport
* FCC Rules, Section 51.319 (e) (2) (i) (A)
  if count_ds3_sp>=3

	total count	inter lata routes	Rochester routes	applicable Verizon routes
routes	76	0	28	48

* Competitive wholesale facilities trigger for dedicated DS3 transport
* FCC Rules, Section 51.319 (e) (2) (i) (B)
  if count_ds3_w>=2

	total count	inter lata routes	Rochester routes	applicable Verizon routes
routes	37	0	0	37

* Self-provisioning trigger for dark fiber transport
* FCC Rules, Section 51.319 (e) (3) (i) (A)
  if count_df_sp>=3

	total count	inter lata routes	Rochester routes	applicable Verizon routes
routes	72	26	0	46

* Competitive wholesale facilities trigger for dark fiber transport
* FCC Rules, Section 51.319 (e) (3) (i) (B)
  if count_df_w>=2

	total count	inter lata routes	Rochester routes	applicable Verizon routes
routes	0	0	0	0

no observations

* Any of 5 triggers for dedicated DS1, DS3, dark fiber transport
* FCC Rules, Section 51.319 (e) (1), (2) & (3)
  if count_ds1_w>=2 or count_ds3_sp>=3 or count_ds3_w>=2
    or count df_sp>=3 or count_df_w>=2

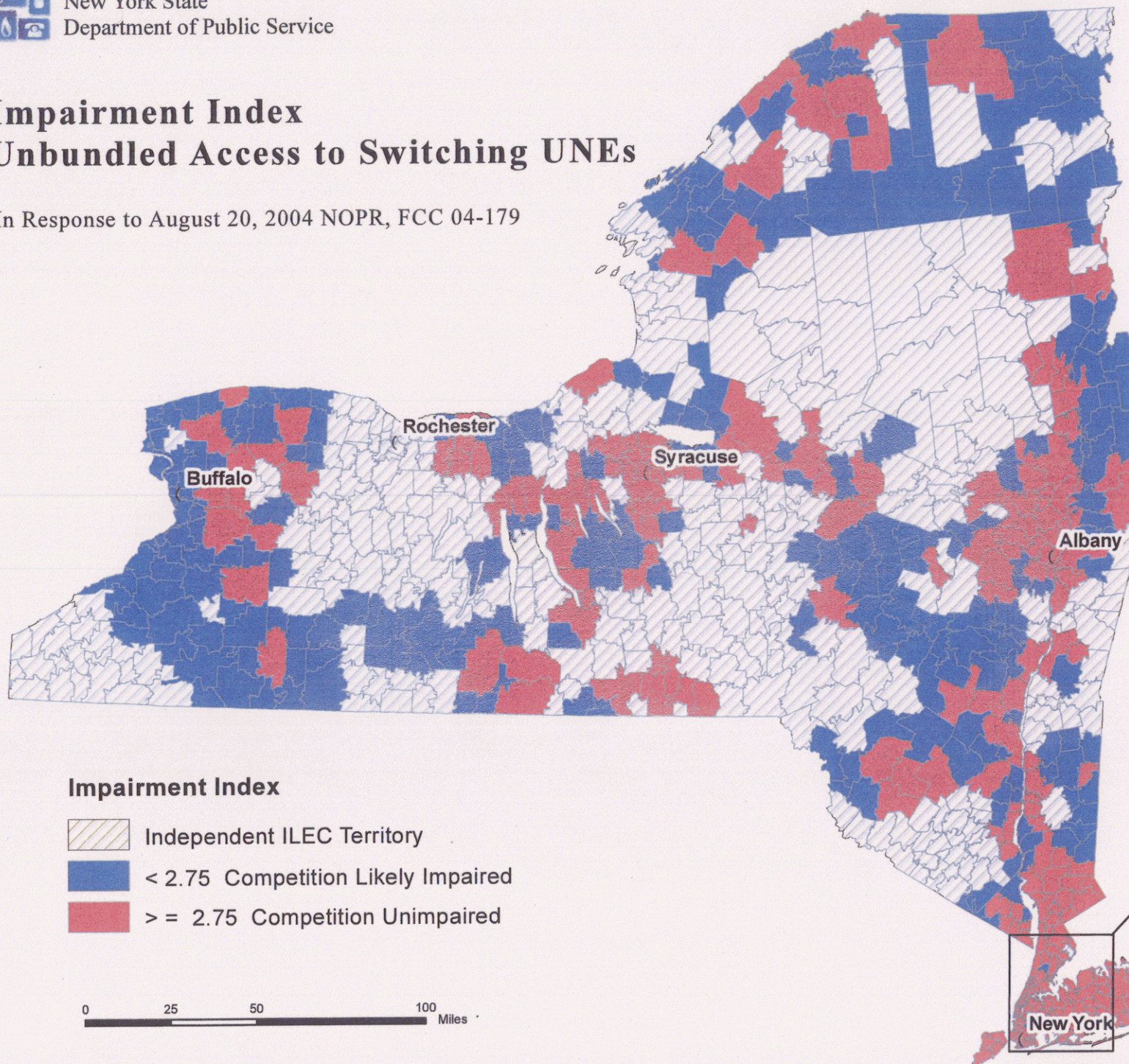|	total count	inter lata routes	Rochester routes	applicable Verizon routes
route	126	26	28	72

APPENDIX D
MAPS

The following pages contain maps produced by NYDPS. The first map depicts the wire center results for local circuit switching from our intermodal impairment index. The second map depicts routes having three or more competitors from a statewide perspective. The third map depicts transport routes having three or more competitors from a regional perspective.

New York State
Department of Public Service

GIS Unit - October 4, 2004

Impairment Index
Unbundled Access to Switching UNEs

In Response to August 20, 2004 NOPR, FCC 04-179

Rochester
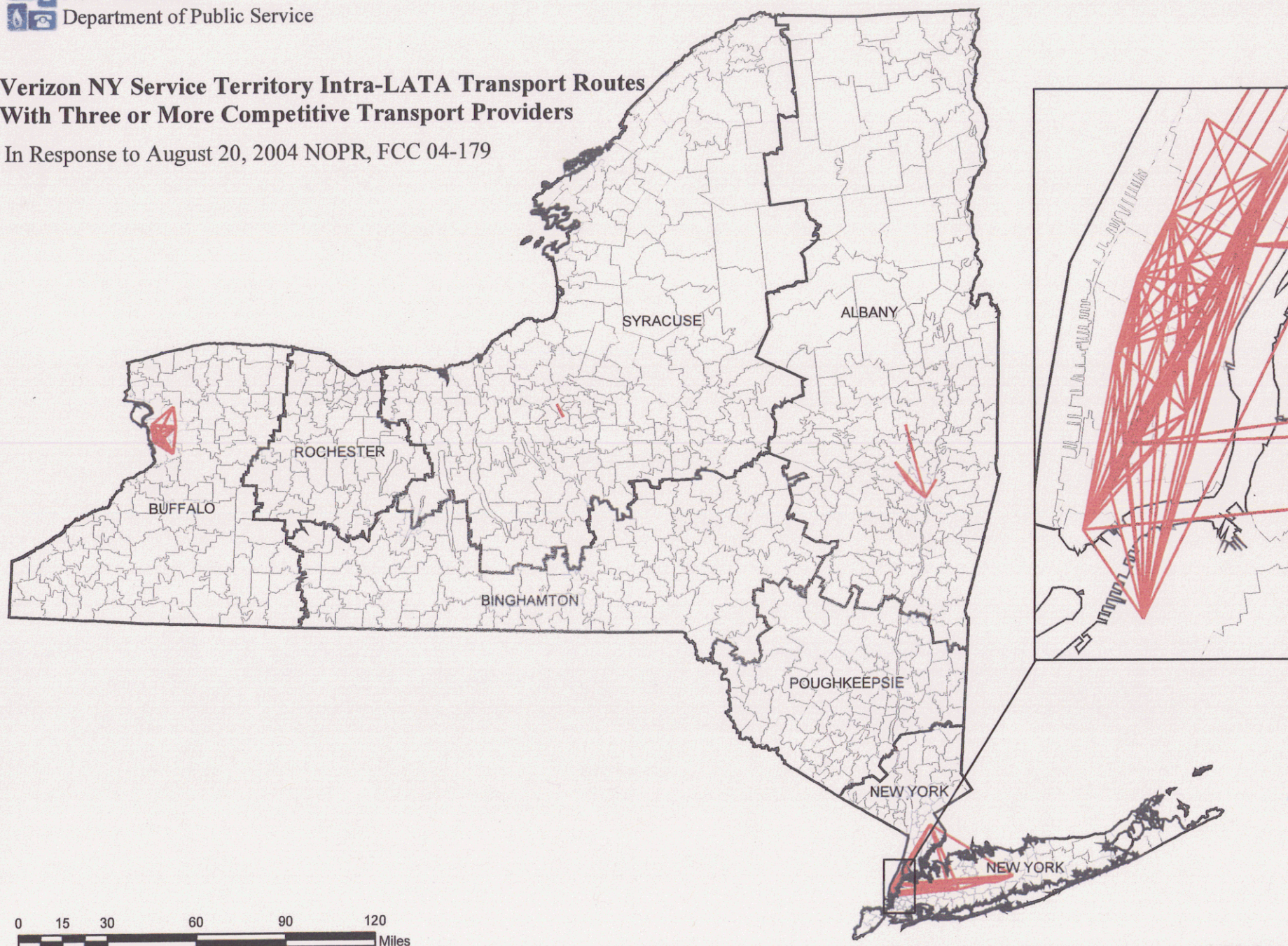
Buffalo

Syracuse

Albany

Impairment Index

Independent ILEC Territory

< 2.75 Competition Likely Impaired

> = 2.75 Competition Unimpaired

0   25   50   100 Miles

New York

DCakmak

New York State
Department of Public Service

GIS Unit - October 4, 2004

Verizon NY Service Territory Intra-LATA Transport Routes
With Three or More Competitive Transport Providers

In Response to August 20, 2004 NOPR, FCC 04-179

SYRACUSE

ALBANY

ROCHESTER

BUFFALO

BINGHAMTON

POUGHKEEPSIE

NEW YORK

NEW YORK

0   15   30   60   90   120
Miles

DCakmak

Verizon NY Service Territory Intra-LATA Transport Routes
With Three or More Competitive Transport Providers

In Response to August 20, 2004 NOPR, FCC 04-179

Buffalo

Albany

Syracuse

DC